Depend on our people. Count on our advice.54

## **REDACTED - FOR PUBLIC INSPECTION**

Received & Inspected

JUN 3 0 2014

June 30, 2014

FCC Mail Room

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

ATTENTION: WIRELINE COMPETION BUREAU

RE: Form 481 ETC filing pursuant to Sections 54.313 and 54.422 SAC 361422, MN, Lonsdale Telephone Company, Inc. Connect America Fund WC Dockets 10-90, 11-42 and 14-58

Dear Ms. Dortch:

Pursuant to Sections 54.313 and 54.422 of Commission's Rules, Lonsdale Telephone Company, Inc, MN, SAC 361422 is filing its Form 481 High Cost and Low-Income Annual Report.

Lonsdale Telephone Company, Inc seeks confidential treatment under the Protective Order in this proceeding for Section 54.313(f)(2) financial information in the 481 filing 1 and for Section 54.202(a) 5 Year Service Quality Improvement Plan portion of the 481 filing pursuant to the Request for Confidential Treatment attached to this filing. Pursuant to the Protective Order, one copy of the confidential document and two copies of the redacted version are provided. The Redacted version is also being filed on the Electronic Comment Filing System.

Please address any correspondence regarding this transmittal to the attention of Tom Campbell at the following address, e-mail or telephone number.

Sincerely,

Tom Campbell

**Telecommunications Consultant** 

tcampbell@otcpas.com

651-621-8511 (v)

651-483-2467 (f)

**Enclosures** 

CC: Mr. Charles Tyler, FCC Telecommunications Access Policy Division (two copies confidential)

<sup>1</sup> See Protective Order 27, WC Docket Nos. 10-90 et al, Rec 14231 rel. November 16 ("Order")

St. Paul Office | 2675 Long Lake Road | St. Paul, MN 55113-1117 | 651-483-4521 | 651-483-2467 FAX | otcpas.com Minneapolis Office | 300 Prairie Center Dr., Ste. 300 | Minneapolis, MN 55344-7908 | 952-941-9242 | 952-941-0577 FAX |

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FCC Mail Room

# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of	)
Connect America Fund	) WC Docket No. 10-90
Lifeline and Link Up Reform	) WC Docket No. 11-42
ETC Annual Reports and Certifications	) WC Docket No. 14-58

## REQUEST FOR CONFIDENTIAL TREATMENT

Lonsdale Telephone Company, Inc., SAC 361422, ("the company") requests that the portion of its Form 481 pertaining to the 5-Year Service Quality Improvement Plan be granted confidential, non-public treatment pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457, 0.459, and related provisions of the Freedom of Information Act ("FOIA"), including 5 U.S.C. § 552(b)(4) ("Exemption 4"). Form 481 contains information regarding the company's Section 54.202(a) 5- Year Service Quality Improvement Plan including capital expenditures and operating expenses. Release of such information would supply a roadmap to competitors regarding confidential build out plans and study area demographics. In addition, the document contains confidential information that is not customarily disclosed to the public or made available within the telecommunications industry. Information in support of the company's request for confidential treatment pursuant to Section 0.459(b) of the Commission's Rules, 47 C.F.R. § 0.459(b), is provided below.

## I. LONSDALE TELEPHONE COMPANY, INC'S FORM 481 SATISFIES THE REQUIREMENTS OF § 0.459 OF THE COMMISSION'S RULES

The material for which the company seeks confidentiality falls squarely within the requirements of Section 0.459 of the Commission's rules. As demonstrated below, the company has satisfied each of the elements of Section 0.459, and disclosure of this information would result in competitive harm to the company.

- (1) Identification of the specific information for which confidential treatment is sought. The company requests confidential treatment for the portion of Form 481 required by 47 C.F.R. § 54.313 related to the Section 54.202(a) 5- Year Service Quality Improvement Plan. The information bears the legend "Confidential Financial Information. The specific information falls into the categories of: 1. Capital Expenditures, 2. Operating Expenses and 3. Area Demographics
- (2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission. The information is required to be produced annually by 47 C.F.R. § 54.313. The proceedings are WC Docket No. 10-90 and WC Docket No. 11-42. The documents will also be submitted in WC Docket NO. 14-58
- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged. The information for which confidentiality is requested is "financial" and commercial in nature. The information is "confidential" in that it "would customarily not be released to the public." The courts have elaborated that material "is 'confidential' . . . if disclosure of the information is likely to have either the following effects: (1) to impair the government's ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained." Both of the considerations apply in this instance, as further explained in point (5) below.
- (4) Explanation of the degree to which the information concerns a service that is subject to competition. All of the services provided by the company are subject to intense existing or potential competition.

<sup>&</sup>lt;sup>1</sup> See Board of Trade of the City of Chicago v. Commodity Futures Trading Comm'n, 627 F.2d 392, 403 & n.78 (D.C. Cir. 1980) (courts have given the terms "commercial" and "financial, as used in Section 552(b)(4), their ordinary meanings).

<sup>&</sup>lt;sup>2</sup> Critical Mass Energy Project v. NRC, 975 F.2d 871, 873 (D.C. Cir. 1992) (citing the Senate Committee Report).

<sup>&</sup>lt;sup>3</sup>Nat'l Parks and Conservation Ass'n v. Morton, 498 f.2d 764, 770 (D.C. Cir. 1974) (footnote omitted); see also Critical Mass Energy, 975 F.2d at 873.

- (5) Explanation of how disclosure of the information could result in substantial competitive harm. If the information were publicly available, it would supply competitors with financial information not ordinarily available to the public. Specifically, rural telephone service has historically lent itself to "cherry picking" by competitors that choose to only serve low cost areas. Release of this specific build out and operating expense information would allow competitors to gain an unfair advantage.
- (6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure. The information for which the company seeks confidential treatment is information that the company does not customarily release to the public. The company also limits the internal circulation of this information to only those with a need to know.

Consistent with 47 C.F.R. § 0.459(a), the items for which confidentiality is requested are being submitted with, and are covered by, this request. This request for confidentiality - as well as the documents subject to this request - are being filed in hard copy and/or electronic copy.

- (7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties. The documents and information for which confidentiality is sought are not made available to the public and have not been disclosed to third parties, except to those entities identified in 47 C.F.R. § 54.313(i). For those disclosures, the company has requested confidential treatment by the entities for the same information.
- (8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure. Given the sensitive nature of the information for which confidentiality is requested, the prospect of serious competitive harm, the company requests that confidential treatment apply indefinitely.

#### II. CONCLUSION

For these reasons, pursuant to Sections 0.457 and 0.459 of the Commission's Rules, the company requests that the portion of Form 481 relating to the Section 54.202(a) 5 - Year Service Quality Improvement Plan be treated as confidential under the Commission's rules and precedent and withheld in their entirety from public inspection, and that any distribution of them within the Commission should be limited to a "need to know" basis. In the event that any person or entity requests access to the documents or seeks to make any or all of them part of the public record, the company requests to be notified immediately so that it can oppose such request or take other action as necessary to safeguard its interests and the interests of consumers.

Sincerely,

Tom Campbell

**Telecommunications Consultant** 

Jano W applell

tcampbell@otcpas.com

651-621-8511 (v)

651-483-2467 (f)

Study Area Name   161412	FCC For	m 481 - Carrier Annua REDACTED — FO	OR PUBLIC IN	SPECTION CC Form 481  SPECTION CONTROL N  July 2013	lo, 3060-0986/OMB Control No. 3060-0819
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<010>	Study Area Code	361422			
<015>	Study Area Name	LONSDALE TE	r co		1-054
<020>	Program Year	2015			
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbel	1		
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511	ext.		8219
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@o	tcpas.com		0.11=0-
<110>	Has your company received its ETC certification from the FCC?	(ye	s/no) <b>O</b>		333311
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	luo	s/no) O O		
<112>	report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.  Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your of CETC which only receives frozen support, your progress report is only required to address voice telephony service.	ompany is a	361422mn112.pdf	No. of Advantage Opening	
	Please check these boxes below to confirm that the attached documents(s), on lin 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	e		Name of Attached Document	
<113>	Maps detailing progress towards meeting plan targets				
<114>	Report how much universal service (USF) support was received	1 11 (-1)	<b>✓</b>		
<115>	How (USF) was used to improve service quality		<b>✓</b>		
<116>	How (USF)was used to improve service coverage		1		
<117>	How (USF) was used to improve service capacity		1		
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.				

<220>

<010>	Study Area Code	361422
<015>	Study Area Name	LONSDALE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

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NORS Reference Number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
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<010>	Study Area Code	361422	
<015>	Study Area Name	LONSDALE TEL CO	
<020>	Program Year	2015	Name of the state
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell	
<035>	Contact Telephone Number - Number of person Identified in data line <030>	6516218511 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com	11 112 22 210 200
<701>	Residential Local Service Charge Effective Date  1/1/2014 Single State wide Residential Local Service Charge		

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<010>	Study Area Code	361422	
<015>	Study Area Name	LONSDALE TEL CO	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell	Land Brown Company Com
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.	Manual Control of the
<039>	Contact Email Address - Email Address of person Identified in data line <030>	tcampbell@otcpas.com	

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<015>	Study Area Name	LONSDALE TEL	co	
<020>	Program Year	2015		
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell		
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ex	xt.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@ot	cpas.com	
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<811>	Holding Company			WWW
<812>	Operating Company Lonsdale Telephone Company, Inc.			
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<010> <015> <020> <030> <035> <039>	Study Area Name Program Year Contact Name - Person USAC should contact regarding this data Contact Telephone Number - Number of person identified in data line <0: Contact Email Address - Email Address of person identified in data line <0 Tribal Land(s) on which ETC Serves	
<920>	Tribal Government Engagement Obligation	Name of Attached Document
to confi	ompany serves Tribal lands, please select (Yes,No, NA) for each these boxes om the status described on the attached document(s), on line 920, trates coordination with the Tribal government pursuant to S(a)(9) includes:  Needs assessment and deployment planning with a focus on Tribal community anchor institutions.  Feasibility and sustainability planning;  Marketing services in a culturally sensitive manner;  Compliance with Rights of way processes  Compliance with Land Use permitting requirements  Compliance with Facilities Siting rules  Compliance with Environmental Review processes  Compliance with Cultural Preservation review processes  Compliance with Tribal Business and Licensing requirements.	Select (Yes,No, NA)

CONTRACTOR OF THE SECOND	o Terrestrial Backhaul Reporting ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	361422
<015>	Study Area Name	LONSDALE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)	
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)	

Lifeline	erms and Condition for Lifeline Customers ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	361422
<015>	Study Area Name	LONSDALE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030	tcampbell@otcpas.com
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	361422mn1210.pdf
		Name of Attached Document
<1220>	Link to Public Website HTTP	***
or the we	heck these boxes below to confirm that the attached document(s), on line 1210, obsite listed, on line 1220, contains the required information pursuant to (a)(2) annual reporting for ETCs receiving low-income support, carriers must report:	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	
<1222>	Details on the number of minutes provided as part of the plan,	
<1223>	Additional charges for toll calls, and rates for each such plan.	

		THE STATE OF STATE OF THE STATE	
	rice Cap Carrier Additional Documentation		FCC Form 481
SCHOOL STREET	lection Form	The Commence of the State of the Commence of t	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including	Rate-of-Return Carriers offiliated with Price Cap Local Exchange Carriers		July 2013
<010>	Study Area Code	361422	
<015>	Study Area Name	LONSDALE TEL CO	NAME OF TAXABLE PARTY OF TAXABLE PARTY.
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data  Contact Telephone Number - Number of person identified in data line <030>	Tom Campbell	
<039>	Contact Feephone Number - Number of person identified in data line <030>	6516218511 ext.	
(033)	Contact Entail Address - Entail Address of person identified in data line 10302	tcampbell@otcpas.com	1000
CHECK t	he boxes below to note compliance as a recipient of incremental Connect Ameri support as set forth in 47 CFR § 54.313(b),(c),(d),(c		High Cost support to offset access charge reductions, and Connect America Phase II noted to the documents attached below is accurate.
2045	Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1))		
<2011>	3rd Year Certification (47 CFR § 54.313(b)(2))		
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))		
<2012>	2013 Frozen Support Certification		
<2013>	2014 Frozen Support Certification	X1	
<2014>	2015 Frozen Support Certification		
<2015>	2016 and future Frozen Support Certification		
	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}		
<2016>	Certification Support Used to Build Broadband		
	Connect America Phase II Reporting (47 CFR § 54.313(e))		
<2017>	3rd year Broadband Service Certification		
<2018>	5th year Broadband Service Certification		
<2019>	Interim Progress Certification		
<2020>	Please check the box to confirm that the attached document(s), on I pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support addresses of community anchor institutions to which began providing preceding calendar year.	shall provide the number, names, and	
2024			9
<2021>	Interim Progress Community Anchor Institutions	1	
		1	
		L	
		Name of	Attached Document Listing Required Information

(3000) R	ate Of Return Carrier Additional Documentation	The state of the s	FCC Form 481	The real bands of the
A	ection Form	The second second	OMB Contral No. 3060-0986	/OM8 Control No. 3060-0819
12.6	and the second of the second o		July 2013	
	and when your		7. 10	
<010>	Study Area Code	361422		
<015>	Study Area Name Program Year	LONSDALE TEL CO 2015		
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell		
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.	372 375 37 0	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com		
CHECK t	the boxes below to note compliance on its five year service quality plan (pursuant			rting requirements set forth in 47
	CFR § 54.313(f)(2). I further certify that the	e information reported on this form and in the documents attach	ed below is accurate.	
			1	
(2010)	Progress Report on 5 Year Plan			
(3010)	Milestone Certification (47 CFR § 54.313(f)(1)(i))	1		
		Name of Attached Document Listing Required Informa	tion	
	Disease shock this how to confirm that the attacked described (		TOTAL CONTRACTOR OF THE CONTRA	
(3011)	Please check this box to confirm that the attached document(s), on line 3( § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresproviding access to broadband service in the preceding calendar year.			
		1		
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))			
		Name of Attached Document Listing Required Information		
(3013) (3014)	is your company a Privately Held ROR Carrier [47 CFR § 54.313(f)(2)) If yes, does your company file the RUS annual report	(Yes/No)	8	
Please	check these boxes to confirm that the attached document(s), on line 3017	contains the required information pursuant to \$ 54 313/0/2	compliance requires:	
	Electronic copy of their annual RUS reports (Operating Report for	and reduced intermedial personalities & 04.0 10(1)(2		
(3015)	Telecommunications Borrowers)		1	
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cas	h Flows		
	era erana eran Er	361422mn3017.pdf		
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation			
		Name of Attached Document Listing Required Information		
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	)rO	
(2010)			السيحات	
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a for	5.0		
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Ca		<u></u>	
(3021)	Management letter issued by the independent certified public accountant that p	erformed the company's financial audit.		
	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:		10 mm 200	
(3022)	Copy of their financial statement which has been subject to review by an			
	independent certified public accountant; or 2) a financial report in a		u	
	format comparable to RUS Operating Report for Telecommunications Borrowers,			
(3023)	Underlying information subjected to a review by an independent certified			
(3023)	public accountant			
(3024)	Underlying information subjected to an officer certification.			
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Case	sh Flows		
	1		1	
(3026)	Attach the worksheet listing required information			
enamed)	enderson at the constraint and the state of			
	L			
		Name of Attached Document Listing Required Information		

A TOTAL DESIGNATION OF THE PERSONS	lion - Reporting Carriet lection Form	PCC Form 481 OMB Control No. 3060-0985/CMB Control No. 3060-0819 July 2013
<010>	Study Area Code	361422
<015>	Study Area Name	LONSDALE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

## TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to t	he Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients
certify that I am an officer of the reporting carrier; my responding carrier; and, to the best of my knowledge, the information	onsibilities include ensuring the accuracy of the annual reporting requirements for universal service support in reported on this form and in any attachments is accurate.
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can	be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonmen under Title 18 of the United States Code, 18 U.S.C. § 1001.

Whitelians 400cm	ion - Agent / Carrier ection Form	FCC Form 481. IOMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	361422
<015>	Study Area Name	LONSDALE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

## TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent) Tom Campbell	is authorized to submit the information reported on be	half of the reporting carrier
	sibilities include ensuring the accuracy of the annual data reporting requirements	provided to the authorized
agent; and, to the best of my knowledge, the reports and data pro	vided to the authorized agent is accurate.	
Name of Authorized Agent: Tom Campbell		
Name of Reporting Carrier: LONSDALE TEL CO		
Signature of Authorized Officer: CERTIFIED ONLINE	Date:	06/25/2014
Printed name of Authorized Officer: Bonnie Simon		
Title or position of Authorized Officer: President		
Telephone number of Authorized Officer: 5077442311 ext.		
Study Area Code of Reporting Carrier: 361422	Filing Due Date for this form: 07/01/2014	

## TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or	is recipients on behalf of reporting	g Carrier
, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal serv the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, th		
Name of Reporting Carrier: LONSDALE TEL CO		A STANII
Name of Authorized Agent or Employee of Agent: Tom Campbell		
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:	06/25/2014
Printed name of Authorized Agent or Employee of Agent: Tom Campbell		
Title or position of Authorized Agent or Employee of Agent Consultant		
Telephone number of Authorized Agent or Employee of Agent: 6516218511 ext.		
Study Area Code of Reporting Carrier: 361422 Filing Due Date for this form:	07/01/2014	

Attachments

Data Col	ce Offerings including Voice Rate Data lection Form		PCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	361422	
<015>	Study Area Name	LONSDALE TEL CO	
<020>	Program Year	2015	4
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell	
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com	
<701>	Residential Local Service Charge Effective Date 1/1/2014		
<702>	Single State-wide Residential Local Service Charge		

<703>

<a1></a1>	<a2></a2>	<a3></a3>	        	        	 	<b4></b4>	<bs><bs>       <br <="" th=""/><th>(C)</th></bs></bs>	(C)
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge		Mandatory Extended Area Service Charge	Total per line Rates and Fee
MN	Lonsdale		FR	29.9	0.0	0.0	0.0	29.9
MN	Lonsdale		MS	17.2	0.0	0.0	0.0	17.2
					-		11-1-	
	/						3)*************************************	
						-		

	ection Form		FCC Form 481 OMB Control No., 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	361422	
<015>	Study Area Name	LONSDALE TEL CO	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell	
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com	

State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)
MN	Lonsdale	19.95	0.0	19.95	3.0	1.5	0.0	Other, No limit on usage allowa
MN	Lonsdale	23.65	0.0	23.65	8.0	3.5	0.0	Other, No limit on usage allowa
MN	Lonsdale	37.85	0.0	37.85	12.0	7.5	0.0	Other, No limit on usage allowa
MN	Lonsdale	49.75	0.0	49.75	15.0	7.5	0.0	Other, No limit on usage allowa
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SAC: 361422 State: MN Lonsdale Tel Co

Form 481 Line No. 112 Five Year Service Quality Improvement Plan

## ATTACHMENT REDACTED IN ENTIRETY

Page 1 of 2

SAC: 361422 State: MN Lonsdale Tel Co

Form 481 Line No. 510 Compliance with Service Quality Standards and Consumer Protection

As required by MN. Rule "7812.0700 Minnesota General Service Quality Requirements. Subpart 1" the local services provided by Lonsdale Tel Co are provided under internal company operating procedures and publically available tariffs which are in compliance with applicable Minnesota Public Utility Commission orders and rules including:

7810.0100 DEFINITIONS. 7810.0200 SCOPE. 7810.0300 STATUTORY AUTHORITY.

#### **RECORDS AND REPORTS**

7810.0400 RETENTION OF RECORDS.
7810.0500 DATA TO BE FILED WITH THE COMMISSION.
7810.0600 REPORT TO COMMISSION ON SERVICE DISRUPTION.
7810.0900 LOCATION OF RECORDS.

#### **CUSTOMER RELATIONS**

7810.1000 INFORMATION AVAILABLE TO CUSTOMER AND PUBLIC. 7810.1100 COMPLAINT PROCEDURES. 7810.1200 RECORD OF COMPLAINT.

#### **CUSTOMER BILLING: DEPOSIT AND GUARANTEE REQUIREMENTS**

7810.1400 CUSTOMER BILLING. 7810.1500 DEPOSIT AND GUARANTEE REQUIREMENTS. 7810.1600 DEPOSIT. 7810.1700 GUARANTEE OF PAYMENT.

#### DISCONNECTION OF SERVICE; SERVICE DELAY

7810.1800 PERMISSIBLE SERVICE DISCONNECTIONS WITH NOTICE.
7810.1900 PERMISSIBLE SERVICE DISCONNECTIONS WITHOUT NOTICE.
7810.2000 NONPERMISSIBLE REASONS TO DISCONNECT SERVICE.
7810.2100 MANNER OF DISCONNECTION.
7810.2200 RECONNECTION OF SERVICE.
7810.2300 NOTICE REQUIREMENTS.
7810.2400 BILL DISPUTES.
7810.2500 ESCROW PAYMENTS.
7810.2600 WAIVING RIGHT TO DISCONNECT; EMERGENCY STATUS.
7810.2800 DELAY IN INITIAL SERVICE OR UPGRADE.

#### DIRECTORIES

7810.2900 CONTENT OF DIRECTORIES. 7810.3000 DIRECTORY ASSISTANCE. 7810.3100 CHANGES OR ERROR OF LISTED NUMBER.

#### **ENGINEERING**

7810.3200 CONSTRUCTION OF TELEPHONE PLANT. 7810.3300 MAINTENANCE OF PLANT AND EQUIPMENT. 7810.3900 EMERGENCY OPERATIONS.

Page 2 of 2

SAC: 361422 State: MN Lonsdale Tel Co

Form 481 Line No. 510 Compliance with Service Quality Standards and Consumer Protection

## INSPECTIONS, TESTS, SERVICE REQUIREMENTS

7810.4100 ACCESS TO TEST FACILITIES.
7810.4300 ACCURACY REQUIREMENTS.
7810.4900 ADEQUACY OF SERVICE.
7810.5000 UTILITY OBLIGATIONS.
7810.5100 TELEPHONE OPERATORS.
7810.5200 ANSWERING TIME.
7810.5300 DIAL SERVICE REQUIREMENTS.
7810.5400 INTEROFFICE TRUNKS.
7810.5500 TRANSMISSION REQUIREMENTS.
7810.5800 INTERRUPTIONS OF SERVICE.
7810.5900 CUSTOMER TROUBLE REPORTS.
7810.6000 PROTECTIVE MEASURES.

7810.6100 SAFETY PROGRAM.

Lonsdale Tel Co is in compliance with Federal CPNI rules, Red Flag Rules and other Federal and State requirements governing the protection of Customer's privacy.

Page 1 of 1

SAC: 361422 State: MN Lonsdale Tel Co

Form 481 Line No. 610 Description of Functionality in Emergency Situations

Lonsdale Tel Co pursuant to MN Rule "7810.390 Emergency Operations" has:

- Established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm, or acts of God including provisions for emergency power that meet or exceed the rule requirement to provide:
  - A minimum of four hours of battery service in each central office.
  - A permanently installed power unit in exchanges exceeding 5000 lines.
  - Mobile power units that can be delivered on short notice and which can be readily.
     connected in offices without installed emergency power facilities.
- Has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power, in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service.